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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LARS JENSEN, an individual,
Plaintiff,

vs.

NATALIE BROWN, et al.,
Defendants.

Case No: 3:22-cv-00045-MMD-CLB

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE
TO FILE SECOND AMENDED
COMPLAINT
(FIRST REQUEST)**

Plaintiff Lars Jensen and Defendants Natalie Brown, et al., by and through their respective undersigned counsel, hereby stipulate and respectfully request that the Court extend the current deadline for Plaintiff to file his Second Amended Complaint. The Court's Order dated April 21, 2025 (ECF No. 69), requires Plaintiff to file his amended complaint by May 6, 2025. The parties are engaging in settlement discussions, including exploring the possibility of mediation. Therefore, the parties stipulate and request that the deadline for (1) Plaintiff to file his Second Amended Complaint be extended by ninety (90) days, up to and including August 5, 2025; and (2) Defendants to file their answer or motion in response to the Second Amended Complaint be extended to sixty (60) days after the date on which Plaintiff files his Second Amended Complaint. This is the first request for an

extension of this deadline. This stipulation is made in good faith and not for purposes of delay.

DATED: April 29, 2025

/s/ John M. Nolan

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DATED: April 29, 2025

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Attorney for Defendants

[PROPOSED] ORDER

IT IS SO ORDERED.

Plaintiff's deadline to file a Second Amended Complaint is extended up to and including August 5, 2025 and Defendants' deadline to answer or otherwise move in response is extended to sixty days after Plaintiff files his Second Amended Complaint.

DATED: _____

Hon. Miranda M. Du

United States District Judge